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Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ARLENE KALODNER, an individual and  
NEIL KALODNER, an individual

Plaintiffs,

vs.

AMERICAN MEDICAL SYSTEMS, INC., a  
Delaware corporation; AMERICAN  
MEDICAL SYSTEMS HOLDINGS, INC., a  
Delaware corporation; ENDO  
PHARMACEUTICALS, INC., a Pennsylvania  
corporation; ENDO PHARMACEUTICALS  
HOLDINGS, INC. a Delaware corporation;  
and ENDO HEALTH SOLUTIONS INC., a  
Delaware corporation; and DOES 1-10 and  
ROE ENTITIES 11-20, inclusive

Defendants.

Court Case No.: 2:13-cv-01717-JAD-PAL

District Court Case No. A-13-685021-C  
District Court Dept. No. XXII

**STIPULATION AND ORDER TO STAY  
PROCEEDINGS PENDING DECISION  
REGARDING TRANSFER TO MDL**

The undersigned counsel of record for Defendants American Medical Systems, Inc., American Medical Systems Holdings, Inc., Endo Pharmaceuticals, Inc., and Endo Health Solutions Inc. (formerly known as Endo Pharmaceuticals Holdings, Inc.) (collectively "Defendants") and Arlene Kalodner and Neil Kalodner ("Plaintiffs") hereby stipulate and agree to stay these proceedings pending a decision from the Judicial Panel on Multidistrict Litigation ("JPML") based on the foregoing:

1. The above-entitled action was commenced in the Eighth Judicial District Court, in and for Clark County, Nevada, Case No. A-13-685021-C ("State Court Action").

2. Plaintiffs Arlene Kalodner and Neil Kalodner commenced the State Court Action by filing a complaint ("Complaint") on July 11, 2013. Plaintiffs filed an Amended Complaint ("Amended Complaint") on September 3, 2013.

3. Counsel for Defendants accepted service of the Amended Complaint as to all Defendants on September 6, 2013.

4. Notice of Removal to the United States District Court for the District of Nevada was filed by Defendants on September 19, 2013.

5. The Judicial Panel on Multidistrict Litigation ("JPML") has established four separate Multi-District Litigation proceedings ("MDL") for claims related to pelvic mesh products, including the devices at issue here. There are more than 17,000 cases like this one in *In re: American Medical Systems, Inc., Pelvic Repair System Products Liability*, MDL 2325 (the "AMS MDL") pending in the United States District Court for the Southern District of West Virginia for coordinated pretrial proceedings under 28 U.S.C. § 1407.

6. Defendants are seeking the transfer of this action to the AMS MDL and have provided the JPML notice of this action pursuant to the "tag-along" procedure contained in the MDL Rules.

7. Defendants and Plaintiff hereby agree to a stay of the instant proceedings pending a decision regarding transfer by the JPML.

Dated this 25th day of September, 2013

Dated this 25th day of September, 2013

GREENBERG TRAURIG, LLP

EGLET WALL CHRISTIANSEN

/s/ Kara B. Hendricks

/s/ Erica D. Entsminger

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IT IS SO ORDERED this 25th day of September, 2013.

UNITED STATES DISTRICT JUDGE